August 31, 2012

To: Executive Board

Subject: **ESMS Program – Final Audit Results**

Recommendation

Receive and file a summary of the Environmental and Sustainability Management System (ESMS) Final Audit Results.

Introduction

On September 30, 2010 Foothill Transit was accepted into the 2011 Federal Transit Administration (FTA) ESMS Institute for transit agencies. This rigorous training is funded by the FTA and administered by Virginia Polytechnic Institute and State University (Virginia Tech). An ESMS is a comprehensive set of procedures, based on an environmental policy that manages an organization's environmental impacts in a strategic manner. Over the course of 18 months, Virginia Tech aided Foothill Transit in the development and implementation of an ESMS at the Arcadia operations and maintenance facility, using the International Organization for Standardization (ISO) 14001:2004 environmental management standards.

Analysis

As part of the ESMS Institute, Virginia Tech provided Foothill Transit with a comprehensive, two-day assessment of its ESMS development and implementation progress. This assessment is known as the "Final Audit," and was conducted on July 23 and 24, 2012. The Final Audit included an examination of documents, observations of activities and conditions, and personnel interviews at the Arcadia operations and maintenance facility. Virginia Tech identified areas in need of improvement in preparation for ISO 14001 certification this fall. The objectives of the ESMS Final Audit are to determine whether the facility:

- Is conforming to the ISO 14001 standard;
- Has properly implemented and maintained its ESMS;
- Identifies areas of potential improvements in the ESMS; and
- Contains a management review process.

The section below lists the percentage of requirements *met, partially met, and not met* with respect to meeting the 17 elements of an ESMS as specified in the ISO 14001 standard.

Percent of requirements **"Met"**	95%
Percent of requirements **"Partially Met"**	4%
Percent of requirements **"Not Met"**	1%

Agenda Item No. 15

Listed below is a breakdown of the final scoring in each of the 17 elements of the ISO standard. **Foothill Transit received an overall score of 97% of out a possible 100%.** Individual program elements are noted below.

ISO Element	Score
General Requirements	100%
Environmental Policy	100%
Environmental Aspects	100%
Legal and Other Requirements	100%
Environmental Objectives, Targets, and Programs	100%
Resources, Roles, Responsibility, and Authority	100%
Competence, Training, and Awareness	93%
Communication	100%
ESMS Documentation	100%
Control of Documents	94%
Operational Control and Contractor Management	100%
Emergency Preparedness and Response	100%
Monitoring and Measurement	100%
Evaluation of Compliance	75%
Nonconformity, Corrective, and Preventative Action	100%
Control of Records	100%
Internal Audits	100%
Management Review	83%

These results reveal that Foothill Transit is on track to achieve ISO 14001 certification this fall.

Sincerely,

Lauren Festner
Sustainability Manager

Doran J. Barnes
Executive Director

Auditor:
W. Robert Herbert
COTA Fellow
Virginia Tech

VirginiaTech
Invent the Future

ems**INSTITUTE**
environmental & sustainability management system

Final Audit Report
July 23 – 24, 2012

Foothill Transit
Arcadia Bus Operations and Maintenance Facility

Foothill Transit
Arcadia Bus Operations and Maintenance Facility
Final Audit

Objectives

The objectives of the ESMS Audit are to determine whether the facility:

- Is conforming to the ISO 14001:2004 standard;
- The ESMS is properly implemented and maintained;
- Identifies areas of potential improvements in the ESMS; and
- Contains a management review process to ensure the continuing sustainability and effectiveness of the overall ESMS.

Scope

Foothill Transit - Arcadia Bus Operations and Maintenance Facility
The site visit for this EMS audit was conducted on July 23, 2012 and July 24, 2012.

Personnel participating in discussions and interviews during the EMS audit included:

- Sharlane Bailey, Project Manager
- Cindy Baldwin, Administrative Assistant
- Lauren Festner, Sustainability Manager
- Roland Cordero, Director of Facilities
- Aaron Lim, Facilities Manager
- Rose Woodford, Project Manager, Virginia Tech
- W. Robert Herbert, Lead Auditor, Virginia Tech

Personnel participating in employee interviews to verify ESMS General Awareness Training and specific SOP training included:

- Daniel Gonzales, First Transit Facility Manager
- Michael Grande, Facility Maintenance
- Valerie Campos, Parts Assistant
- Richard Fierro, Driver
- Rhonda LeBreton, Driver

Summary

W. Robert Herbert, an ISO 14001 certified Lead Auditor; certificate # 2453 conducted the audit, assisted by Rose Woodford, Project Manager for Virginia Tech.

This Environmental and Sustainability Management System (ESMS) Audit is conducted as the final follow-up to an eighteen month program by the FTA ESMS Institute at Virginia Tech. The purpose of this report is to present the ESMS Audit findings and conclusions to Senior Management and the ESMS Team.

The ESMS was evaluated against each of the requirements set out in the ISO 14001:2004 standard entitled Environmental management systems - Requirements with guidance use. The audit included the examination of documents, interviews of personnel and observations of activities and conditions. The ESMS Team participated in the review and discussion regarding the scoring.

This section compares the percentage of requirements *met, partially met and not met* with respect to meeting the requirements of an EMS as specified in the ISO 14001:2004 standard. The following scores are the result of the EMS audit presented in this report:

Percent meeting all requirements **"Overall Score"**	97%
Percent of requirements **"Met"**	95%
Percent of requirements **"Partially Met"**	4%
Percent of requirements **"Not Met"**	1%

■ Met 95%
■ Partially Met 4%
■ Not Met 1%
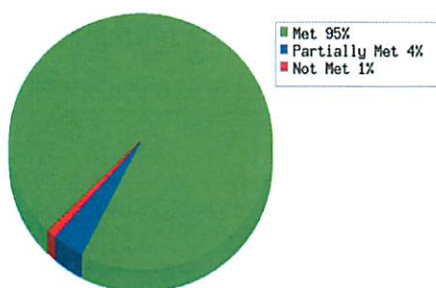
	The ISO 14001:2004 standard elements of an EMS	Overall Score (%)	Met (%)	Partially Met (%)	Not Met (%)
4.1	General Requirements	100	100	0	0
4.2	Environmental Policy Requirements	100	100	0	0
4.3.1	Environmental Aspects Requirements	100	100	0	0
4.3.2	Legal and Other Requirements	100	100	0	0
4.3.3	Objectives, Targets and Programs Requirements	100	100	0	0
4.4.1	Resources, Roles, Responsibility and Authority	100	100	0	0
4.4.2	Competence, Training and Awareness	93	86	14	0
4.4.3	Communication	100	100	0	0
4.4.4	EMS Documentation	100	100	0	0
4.4.5	Control of Documents	94	89	11	0
4.4.6	Operational Control	100	100	0	0
4.4.7	Emergency Preparedness and Response	100	100	0	0
4.5.1	Monitoring and Measurement	100	100	0	0
4.5.2	Evaluation of Compliance	75	50	50	0
4.5.3	Nonconformity, Corrective Action and Preventive Action	100	100	0	0
4.5.4	Control of Records	100	100	0	0
4.5.5	Internal Audits	100	100	0	0
4.6	Management Review	83	83	0	17

Detailed EMS Performance Results

The following sections provide a comparative analysis of the performance of the EMS with respect to meeting each of the requirements of the ISO 14001:2004 Standard.

General Requirements

The result of implementing an EMS is improved environmental performance. Therefore the organization must evaluate its EMS to identify opportunities for improvement and their implementation. The rate, extent and timescale of this continual improvement process is determined by the organization. The organization must define and document the scope of its EMS. Defining the scope is intended to clarify the boundaries of the EMS within the organization.

	General Requirements (4.1)	Met	Partially Met	Not Met
1.0	The organization shall establish, **document**, implement, maintain and **continually improve** an environmental management system (EMS) in accordance with the requirements of ISO 14001.	X		
2.0	The organization shall determine how it will fulfill the requirements of ISO 14001.	X		
3.0	The organization shall **define and document** the scope of its EMS.	X		

Environmental Policy Requirements

The Environmental Policy establishes an overall sense of direction. It also forms the basis for setting the objectives and targets, along with providing for ongoing improvement of the EMS. Top management must define the Environmental Policy.

1.0	Environmental Policy Requirements (4.2)	Met	Partially Met	Not Met
1.1	Top management has **defined** the environmental policy.	X		
1.2	Top management has ensured that the environmental policy, within the defined scope of its EMS, is **appropriate** to the nature, scale and environmental impacts of the organization's activities, products and services.	X		
1.3	Top management has ensured that the environmental policy includes a commitment to **continual improvement** and **prevention of pollution.**	X		
1.4	Top management has ensured that the environmental policy includes a commitment to comply with **applicable legal requirements,** and with other requirements to which the organization subscribes which relate *to its environmental aspects.*	X		
1.5	Top management has ensured that the Environmental Policy provides the framework for setting and reviewing environmental **objectives and targets.**	X		
1.6	Top management has ensured that the Environmental Policy is **documented.**	X		

1.7	Top management has ensured that the Environmental Policy is **implemented.**	X		
1.8	Top management has ensured that the Environmental Policy is **maintained.**	X		
1.9	Top management has ensured that the Environmental Policy is **communicated to *all persons working for or on behalf of the organization.***	X		
1.10	Top management has ensured that the Environmental Policy is **available to the public.**	X		

Environmental Aspects Requirements

The purpose of identifying Environmental Aspects is to determine the aspects that have or can have significant environmental impacts.

2.0	**Environmental Aspects Requirements (4.3.1)**	**Met**	**Partially Met**	**Not Met**
2.1	The organization **has established and implemented a procedure(s)** to identify the Environmental Aspects of its activity, products and services, within the defined scope of the EMS, that it can control and those that it can influence taking into account planned or new developments, or new or modified activities, products and services, to determine those aspects that have or can have significant impacts on the environment *(i.e. significant Environmental Aspects).*	X		
2.2	The organization **maintains a procedure** to identify the Environmental Aspects of its activities, products and services within the defined scope of the EMS that it can control and those that it can influence taking into account planned or new developments, or new or modified activities, products and services, to determine those aspects that have or can have significant impacts on the environment *(i.e. significant Environmental Aspects).*	X		
2.3	The organization has ensured that the **significant Environmental Aspects** are taken into account in establishing, implementing and maintaining its EMS.	X		
2.4	The organization has ensured that the **information** on its Environmental Aspects is documented and **kept up to date.**	X		

Legal and Other Requirements

The core EMS Team should have in place procedures for identifying and accessing all of the Legal and Other Requirements that apply to the environmental aspects relating to the activities, products and services.

3.0	Legal and Other Requirements (4.3.2)	Met	Partially Met	Not Met
3.1	The organization has **established and implemented a procedure(s)** to identify and have access to the applicable Legal and Other Requirements to which the organization subscribes related to its environmental aspects and to determine how these requirements apply to its environmental aspects.	X		
3.2	The organization has **maintained a procedure(s) to identify** and have access to the applicable Legal and Other Requirements to which the organization subscribes related to its environmental aspects and to determine how these requirements apply to its environmental aspects.	X		
3.3	The organization has ensured that the applicable legal and other requirements are taken into account in establishing, implementing and maintaining its EMS.	X		

Objectives, Targets and Programs Requirements

Establishing the Objectives and Targets is a major step in implementing the EMS. This requires the development of specific Objectives and Targets to address the identified significant aspects.

4.0	Objectives, Targets and Programs Requirements (4.3.3)	Met	Partially Met	Not Met
4.1	The organization has **established** and implemented documented environmental Objectives and Targets at relevant functions and levels within the organization.	X		
4.2	The organization has **maintained** documented environmental Objectives and Targets at relevant functions and levels within the organization.	X		
4.3	The organization has ensured that its Objectives and Targets are **measurable**, where practicable, and consistent with its environmental policy, including the commitments to prevention of pollution, to compliance with applicable legal requirements and with other requirements to which the organization subscribes, and to continual improvement.	X		
4.4	The organization has *taken into account* the **Legal and Other Requirements to which it subscribes** when establishing and reviewing its objectives and targets.	X		
4.5	The organization has *taken into account* its **significant environmental aspects** when establishing and reviewing its Objectives and Targets.	X		
4.6	The organization has **considered its technological options** when establishing and reviewing its Objectives and Targets.	X		

4.7	The organization has **considered its financial, operational and business requirements** when establishing and reviewing its Objectives and Targets.	X		
4.8	The organization has **considered the views of the interested parties** when establishing and reviewing its Objectives and Targets.	X		
4.9	The organization has **established, implemented and maintained a program(s)** for achieving its Objectives and Targets.	X		
4.10	The organization has included in the program(s) the designation of the responsibility for achieving Objectives and Targets at relevant functions and levels of the organization.	X		
4.11	The organization has included in the program(s) the means and timeframe by which the Objectives and Targets are to be achieved.	X		

Resources, Roles, Responsibility and Authority

The core EMS Team must define the Roles, Responsibilities, and Authorities in their EMS to ensure successful implementation of the system.

5.0	**Resources, Roles, Responsibility and Authority Requirements (4.4.1)**	**Met**	**Partially Met**	**Not Met**
5.1	Management has **ensured** the availability of **resources** essential to establish, implement, maintain and improve the EMS, including human resources and specialized skills, *organizational infrastructure*, technology and financial resources.	X		
5.2	The organization has **defined and documented Roles**, Responsibility and Authorities in order to facilitate effective environmental management.	X		
5.3	The organization has **communicated Roles, Responsibility and Authorities** in order to facilitate effective environmental management.	X		
5.4	**Top management has appointed a specific management representative(s)** who, <u>irrespective of other responsibilities,</u> have defined Roles, Responsibilities and Authority for ensuring that an EMS is established, implemented and maintained in accordance with the requirements of **ISO 14001.**	X		
5.5	The **specific management representative(s)** appointed by top management have defined Roles, Responsibilities and Authorities for reporting to top management on the performance of the EMS **for review**, including recommendations for improvement.	X		

Competence, Training and Awareness

The core EMS Team must identify the training needs and ensure that all personnel whose work may have a significant environmental impact are trained appropriately. This requires ensuring that these personnel are competent in terms of their education, training and or experience.

6.0	Competence, Training and Awareness Requirements (4.4.2)	Met	Partially Met	Not Met
6.1	The organization has ensured that *any person(s) performing tasks* for it or on its behalf that have the potential to cause significant impact(s) identified by the organization is (are) **competent** on the basis of appropriate education, training or experience, and shall retain associated records.	X		
6.2	The organization has **identified training needs** associated with its environmental aspects and its EMS.	X		
6.3	The organization has **provided training** or *taken other action* to meet the identified needs, and has retained associated records.	X		
6.4	The organization has established, implemented and maintained a procedure(s) to make persons working for or on its behalf **aware of the importance of conformities** with the environmental policy and procedures and with the requirements of the EMS.	X		
6.5	The organization has established, implemented and maintained a procedure(s) to make persons working for or on its behalf **aware of the significant environmental aspects and related actual or potential impacts** associated with their work, and the environmental benefits of improved personal performance.		X	
6.6	The organization has established, implemented and maintained a procedure(s) to make persons working for or on its behalf **aware of their roles and responsibilities** in achieving conformity with the requirements of the EMS.	X		
6.7	The organization has established, implemented and maintained a procedure(s) to make persons working for or on its behalf **aware of the potential consequences of departure** from specified procedures.	X		

Communication

The core EMS Team must develop procedures for internal and external communications regarding the environmental aspects and the EMS.

7.0	Communication Requirements (4.4.3)	Met	Partially Met	Not Met
7.1	With regard to its environmental aspects and EMS, the organization has **established, implemented and maintained a procedure(s)** for __internal communication__ among its various levels and functions.	X		
7.2	With regard to its environmental aspects and EMS, the organization has established, implemented and maintained a procedure(s) for **receiving, documenting and responding** to relevant communication from __external__ **interested parties.**	X		
7.3	The organization has decided whether to communicate externally about its significant environmental aspects, and has documented its decision. If the decision is to communicate the organization shall establish and implement a method(s) for this external communication.	X		

EMS Documentation

The EMS documentation must describe the core elements of the EMS. This is achieved by developing a procedure to address each element of the ISO 14001:2004 Standard.

8.0	EMS Documentation Requirements (4.4.4)	Met	Partially Met	Not Met
8.1	The organization's EMS Documentation includes the **environmental policy, objectives and targets.**	X		
8.2	The organization's EMS Documentation includes a **description of the scope** of the EMS.	X		
8.3	The organization's EMS Documentation includes a description of the **main elements of the EMS** and their interaction, and reference to related documents.	X		
8.4	The organization's EMS Documentation includes the documents, including records, **required by ISO 14001.**	X		
8.5	The organization's EMS Documentation includes the documents, including records, determined by the organization to be necessary to ensure the effective planning, operation and control of processes that relate to its significant environmental aspects.	X		

Control of Documents

The proper control and management of Documents is critical to the successful implementation of an EMS; therefore, the documentation control procedures must be effective and efficient.

9.0	Control of Documents Requirements (4.4.5)	Met	Partially Met	Not Met
9.1	The organization has established, implemented and maintained a **procedure(s) for controlling all documents** required by the EMS and by ISO 14001.	X		
9.2	The organization has established, implemented and maintained a procedure(s) to **approve Documents for adequacy** prior to issue.	X		
9.3	The organization has established, implemented and maintained a procedure(s) to **review and update as necessary** and reapprove Documents.	X		
9.4	The organization has established, implemented and maintained a procedure(s) to ensure that **changes and a current revision** status of Documents are identified.	X		
9.5	The organization has established, implemented and maintained a procedure(s) to ensure that **relevant versions** of applicable documents are **available at points of use**.	X		
9.6	The organization has established, implemented and maintained a procedure(s) to ensure that Documents remain **legible** and readily identifiable.	X		
9.7	The organization has established, implemented and maintained a procedure(s) to ensure that Documents of **external origin** determined by the organization to be necessary for the planning and operation of the EMS are **identified and their distribution controlled**.		X	
9.8	The organization has established, implemented and maintained a procedure(s) to prevent the **unintended use of obsolete Documents** and apply suitable identification to them if they are retained for any purpose.	X		
9.9	The organization has considered **records** as a special type of Document to be controlled in accordance with the requirements given in 4.5.4.	X		

Operational Control

The purpose of establishing proper Operational Controls is to ensure that the facility adheres to the environmental policy and that the objectives and targets are met.

10.0	Operational Control Requirements (4.4.6)	Met	Partially Met	Not Met
10.1	The organization has **identified _and planned_** those operations that are associated with the identified **significant environmental aspects** consistent with its environmental policy, objectives and targets.	X		

		Met	Partially Met	Not Met
10.2	The organization has planned the operations associated with the identified significant environmental aspects to ensure that they are carried out under specified conditions by establishing, implementing and maintaining a **documented** procedure(s) to control situations where their **absence could lead to deviation** from the environmental policy, objectives and targets.	X		
10.3	The organization has planned the operations associated with the identified **significant environmental aspects** to ensure that they are carried out under specified conditions **by stipulating the operating criteria** in the procedure(s).	X		
10.4	The organization has planned the operations associated with the identified significant environmental aspects of goods and services used by the organization and **communicating applicable procedures and requirements to the suppliers including contractors.**	X		

Emergency Preparedness and Response

Emergency preparedness and response procedures must be established and maintained in order to identify the potential for and respond to emergencies and accidents, and to prevent or minimize their environmental impacts.

11.0	Emergency Preparedness and Response Requirements (4.4.7)	Met	Partially Met	Not Met
11.1	The organization has established, implemented and maintained a **procedure(s) to identify potential** emergency situations and potential accidents that can have an impact(s) on the environment and how it will respond to them.	X		
11.2	The organization shall *respond to actual emergency* situations and accidents and **prevent or mitigate associated adverse environmental impacts.**	X		
11.3	The organization shall periodically **review** and, where necessary revise its emergency preparedness and response procedures, in particular, **after the occurrence** of accidents or emergency situations.	X		
11.4	The organization shall also **periodically test such** procedures **where practicable.**	X		

Monitoring and Measurement

The core EMS Team must develop procedures for regularly monitoring and measuring the key characteristics of the operations and activities that can significantly impact the environment. This includes documenting performance tracking information, relevant operational controls and conformance with the environment objectives and targets.

12.0	Monitoring and Measurement Requirements (4.5.1)	Met	Partially Met	Not Met
12.1	The organization has established, implemented and maintained a **procedure(s) to monitor and measure**, on a regular basis, the **key characteristics of its operations** that can have a significant environmental impact.	X		
12.2	The organization's procedures include the documenting of information to **monitor performance**, applicable operational controls and **conformity with its environmental objectives and targets.**	X		
12.3	The organization has ensured that **calibrated** or verified **monitoring and measurement equipment is used** and maintained and that associated **records are retained.**	X		

Evaluation of Compliance

The core EMS Team needs to document procedures for evaluating compliance with relevant environmental laws and regulations.

13.0	Evaluation of Compliance Requirements (4.5.2)	Met	Partially Met	Not Met
13.1	Consistent with its commitment to compliance, the organization has established, implemented and maintained a **procedure(s) for periodically evaluating compliance** with applicable regulations, and **keeps records of the results** of the periodic evaluation.	X		
13.2	The organization has established, implemented and maintained a procedure(s) for periodically evaluating compliance with **other requirements to which it subscribes, and keeps records of the results of the periodic evaluations.** (i.e. customer requirements, industry codes of practice, voluntary labeling or stewardship commitments, requirements of trade associations, etc.)		X	

Nonconformity, Corrective Action and Preventive Action

The core EMS Team must develop a procedure for addressing nonconformance, mitigating environmental impacts and taking corrective and preventive action.

14.0	Nonconformity, Corrective Action and Preventive Action Requirements (4.5.3)	Met	Partially Met	Not Met
14.1	The organization has established, implemented and maintained a procedure(s) for **dealing with and handling potential nonconformities** and for taking corrective action and preventive action.	X		
14.2	The procedures define requirement for identifying and correcting nonconformity(ies) and **taking actions to mitigate** their environmental impacts.	X		
14.3	The procedures define requirements for investigating nonconformity(ies) determining their cause(s) and taking actions in order to **avoid their reoccurrence.**	X		
14.4	The procedures define requirements for evaluating the need for action(s) to **prevent nonconformity(ies)** and implementing appropriate actions designed to **avoid their occurrence.**	X		
14.5	The procedures define requirements for **recording the results** of corrective action(s) and preventive action(s) taken.	X		
14.6	The procedures defined requirements for **reviewing the effectiveness** of corrective action(s) and preventive action(s) taken.	X		
14.7	The actions taken are **appropriate to the magnitude of the problems** and the environmental impacts encountered.	X		
14.8	The organization ensures that any necessary **changes are made to EMS documentation.**	X		

Control of Records

There must be a procedure for the environmental records, including training records, audits and management review results.

15.0	Control of Records Requirements (4.5.4)	Met	Partially Met	Not Met
15.1	The organization has established and maintained records as necessary **to demonstrate conformity** to the requirements of its **EMS** and of **this standard**, and the results achieved.	X		
15.2	The organization has established, implemented and maintained a procedure(s) for **the identification, storage, protection, retrieval retention, and disposal** of records.	X		
15.3	Records shall be and remain **legible**, identifiable, and traceable.	X		

Internal Audits

The core EMS Team must develop programs and procedures for periodically conducting audits of the EMS. The programs and procedures are necessary to evaluate the system performance requirements and to provide information regarding audit results to senior management.

16.0	Internal Audits Requirements (4.5.5)	Met	Partially Met	Not Met
16.1	The organization has ensured that Internal Audits of the EMS are conducted at planned intervals to determine whether the EMS **conforms** to planned arrangements for environmental management including the **ISO 14001 requirements.**	X		
16.2	The organization has ensured that Internal Audits of the EMS are conducted as planned intervals to **provide information** on the **results of audits to management.**	X		
16.3	The organization has ensured that its audit program(s) are **planned,** established, implemented and maintained by the organization, taking into consideration the **environmental importance of the operation(s)** concerns and the **results of previous audits.**	X		
16.4	Audit procedures are established, implemented and maintained that address the **responsibilities** and requirements for **planning** and **conducting audits, reporting results and retaining associated records.**	X		
16.5	Audit procedures are established, implemented and maintained that address the determination of **audit criteria, scope, frequency and method.**	X		
16.6	The **selection of auditors** and conduct of audits ensures the objectivity and the impartiality of the audit process.	X		

Management Review

The senior management staff and the EMS Team must periodically assess the effectiveness of the EMS. The assessment must address potential changes to the system based on the audit results, changing circumstances and management's commitment to continual improvement.

17.0	Management Review Requirements (4.6)	Met	Partially Met	Not Met
17.1	The organization has ensured that its **top management** has **planned the intervals** at which it will review the EMS.	X		
17.2	The organization has ensured that top management has **reviewed** the EMS to ensure its continuing suitability, adequacy and effectiveness.	X		
17.3	The organization has ensured that the Management Reviews include assessing **opportunities for improvement** and the **need for changes to the EMS**, including the environmental policy and environmental objectives and targets.	X		
17.4	The organization has ensured that records of the Management Reviews are retained.	X		

17.5	Management Review inputs shall include:			X
	1. Results of internal audits and evaluation of compliance with legal requirements and with other requirements to which the organization subscribes.			
	2. Communication(s) from external interested parties, including complaints.			
	3. The environmental performance of the organization.			
	4. The extent to which objectives and targets have been met.			
	5. Status of corrective and preventive actions.			
	6. Follow-up actions from previous Management Reviews.			
	7. Changing circumstances, including developments in legal and other requirements related to its environmental aspects, and			
	8. Recommendations for improvement.			
17.6	Management Review outputs shall include any decisions and actions related to **possible changes** to environmental policy, objectives, targets and other elements of the EMS, consistent with the **commitment to continual improvement.**	X		

Closing Comments

This ESMS audit was conducted in accordance with the requirements of the ISO 14001:2004 Standards. The Standard requires the planning and performance of an ESMS audit to obtain reasonable assurance that the facility has implemented and maintained an ESMS. An ESMS audit includes examining, on a test basis, evidence relating to the subject matter. It also includes assessing the criteria used as well as evaluating the decisions made by management.

During the course of this ESMS audit, the results of previous audits were evaluated for effective corrective action. Progress and improvements were noted from the previous recommendations.
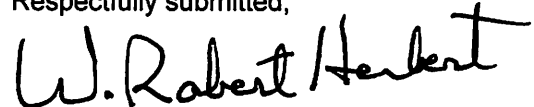
The findings and nonconformances identified during this ESMS Audit are documented in this report. However, after the implementation is complete some items considered minor could become major nonconformances in a mature ESMS. **Please review and address any items scored as "Partially Met" and/or "Not Met" prior to another EMS audit.**

Because of the inherent limitations of any ESMS, errors or irregularities may occur and may not be detected. Also, projections or evaluations in the future time period may become inadequate because of changes in conditions, which may deteriorate the degree of conformance with the ISO 14001:2004 Standards.

This report is intended for use within your organization, the Federal Transit Administration and Virginia Tech.

Your ESMS Team has put forth a tremendous effort and has demonstrated diligence, commitment and professionalism. They have provided the degree of thought and foresight into the planning and development that is required to succeed with the ESMS implementation phase.

Respectfully submitted,

W. Robert Herbert
Lead Auditor